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ATTORNEY FOR Plaintiff



UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

PATRICIA BONELLI, A Single
Woman, Individually,

Plaintiff,

CASE NO. 3:14-cv-02352

vs.

APPLICATION AND MOTION FOR
EXTENSION OF TIME TO SERVE
SUMMONS AND COMPLAINT AND
DECLARATION FILED IN SUPPORT


U. S. BANK NATIONAL ASSOCIATION
As TRUSTEE FOR THE CERTIFICATE
HOLDERS OF The **CITIGROUP MORT-**
GAGE LOAN TRUST INC. ASSET-
BACKED PASS-THROUGH CERTIFICATE
SERIES 2005-3 TRUST FUND; CITI-
GROUP MORTGAGE LOAN TRUST
INCORPORATED; CITIMORTGAGE INC;
CITIBANK N.A.; COUNTRYWIDE HOME
LOANS SERVICING; WELLS FARGO
BANK, N.A., and DOES 1 through
400, Inclusive,

COMPLAINT AFFECTS REAL PROPERTY
AT 3662 BELLAGIO COURT, SANTA ROSA,
CALIFORNIA 95404.

Defendants.

Comes now **PATRICIA BONELLI**, by and through their attorney, Peter J. Mueller, and moves the court for an extension of time to serve the summons and complaint in the captioned action to provide continuing time for modification negotiations by and between the Plaintiff and Wells Fargo Bank. The Plaintiff seeks an extension for a reasonable time for the modification negotiations to move forward and submit the declaration of Peter J. Mueller in support thereof.

Dated: July 25, 2014


Peter J. Mueller, Attorney
For Plaintiff.

Declaration Of Peter J. Mueller

I, Peter J. Mueller, declare and say as follows:

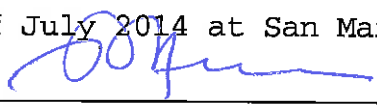
1. I am an attorney licensed to practice in California and before this court.

2. That modification negotiations have commenced between the Plaintiff on the one hand and by Wells Fargo Bank on the other, concerning the Plaintiff's note and mortgage on the property the subject of the captioned action.

3. That is respectfully requested that the court in its discretion extend the time within which to serve the summons and the complaint herein a reasonable time.

4. As counsel in this case and others it is my experience that modification negotiations can extend for upwards of three or more months given the complexities of modification financing laws, rules and practices.

I declare under penalty of perjury that the foregoing is true and correct. If sworn I can competently testify to each of the foregoing facts. Executed this 25th day of July 2014 at San Marcos, California.


Peter J. Mueller, Attorney
For Plaintiff.

Plaintiff's request is GRANTED. All deadlines are extended by 90 days.

IT IS SO ORDERED.

Dated: July 25, 2014

